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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

NOTICE OF CONTINUING PROCEDURAL
ABUSE FOLLOWING FAILED
SETTLEMENT CONFERENCE

Dated this: April 25, 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

TO THE HONORABLE COURT:

Plaintiff Marc Wolstenholme respectfully submits this Notice to apprise the Court of ongoing procedural misconduct by Defendant Riot Games, Inc. and its legal counsel, following the failed Court-ordered settlement conference on April 24, 2025, during which settlement wasn't a viable option despite the Plaintiff's heavily documented concerns that he would not attend unless the spirit of the conference was upheld. It wasn't. The conference was merely more costly abusing of procedures to pressure and intimidate.

I. Settlement Conference Result and Conduct

At the conclusion of the mandatory settlement conference, it became evident through:

Statements made during the conference;

Conduct of Defendant's counsel, and;

Comments by individuals affiliated with Riot Games' broader online community, that Defendant Riot Games and its legal representatives intend to continue filing repetitive, cumulative, and retaliatory motions with the specific purpose of exhausting and crippling the Plaintiff, rather than addressing the merits of the case.

1 Further, it was suggested, both implicitly and explicitly, that Riot's legal strategy
2 is to:

3 Overwhelm the Plaintiff procedurally;

4 Manufacture grounds for dismissal through procedural attrition;

5 Delay discovery indefinitely to avoid confronting the substantive allegations.
6
7

8 This is procedural abuse, harassment and discrimination based on disability which
9 is being directly targeted without protection, such as public scrutiny and fairness.
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11

12 If you had your 10 years of trauma writing violated by a monstrosly powerful
13 company with a documented history of abusing vulnerable people, and you were told by a Judge
14 that this overwhelming and abusing the Plaintiff procedurally is their plan and it will work
15 eventually so you should settle for nothing, despite all the evidence showing that it's your work,
16 how would you feel about the fairness of justice in a closed hearing which you raised concerns
17 about way before the hearing, and it was clear that Riot had no intention of settling and they had
18 already stated as much but you were still made to attend and made to litigate on the spot for 2.5
19 hours during which you were presented with inadmissible and unfiled evidence of a single
20 snapshot from a public nonsensical site (Wayback Machine) which is produced as evidence of no
21 portal submissions in a closed settlement hearing when Riot has it's own servers and A Moss has
22 discussed combing through their submissions and this is recorded?
23
24
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27

1 I cannot believe I was duped into even attending that hearing and now feel that
2 every single hearing needs to be recorded and conducted in public.
3

4 **II. Immediate Post-Conference Filing Wave**

5 Within an hour of the failed settlement conference, Riot filed a flurry of motions
6 (Dkt. 101, 102, 103, 104, 105, 106), many of which recycled arguments previously rejected or
7 pending. This immediate action is consistent with their stated (and threatened) strategy and
8 evidences bad faith which was directly told to the Plaintiff in the settlement hearing.
9
10

11 **III. Coordinated Harassment and Public Pressure**

12 Plaintiff further notes that, outside the courtroom, members of Riot's online
13 community—encouraged indirectly by Riot's public posture—have continued harassment
14 campaigns, including threats, intimidation, and reputational smearing with knowledge of
15 discussions of attachments, right after the settlement hearing. This contributes to an atmosphere
16 designed to isolate and destabilize the Plaintiff emotionally and financially.
17
18

19 The statement conference and the continued pattern of harassment directly after
20 marks a three-pronged attack.
21

22 1, They misused the settlement conference and judge's role to only address and
23 attack access and not to settle. During which it is threatened that they will abuse until the case is
24 dismissed.
25
26

3, Three, they have their radicalized “Community” harass and mock the Plaintiff right after.

The Plaintiff respectfully submits that Riot Games' conduct constitutes:

Vexatious litigation behavior (FRCP 11(b), Local Rule 83-7);

Bad faith multiplication of proceedings (28 U.S.C. § 1927);

Retaliation against lawful exercise of rights;

Violation of good faith expectations inherent in the Court's orders regarding settlement efforts.

Plaintiff respectfully requests that the Court:

Take judicial notice of this pattern of conduct;

Consider imposing limits on further motion practice without leave of Court;

Consider ordering supervised scheduling conferences to prevent procedural abuse;

Consider awarding reasonable costs or sanctions for abusive filings if appropriate

Effectively protect the Plaintiff from further abuse.

Make all discovery and future hearings public, with only Fernando M. Olguin

1 **VI. Conclusion**

2 The Plaintiff seeks no advantage by this Notice but wishes to protect the integrity
3 of the proceedings and ensure that justice is not defeated by gamesmanship. The plaintiff
4 respectfully reserves all rights to pursue further motions to protect the litigation process if
5 necessary.
6

7 This will become one of those cases which is looked back on, when people are
8 discussing why this was allowed to continue in this manner and why Riot's radical community
9 was never investigated.
10

11 **Declaration of Authenticity:**

12 I, Marc Wolstenholme, declare under penalty of perjury that the statements made
13 are true and accurate
14

15 Executed on April 25, 2025, in Coventry, England.

16 Respectfully submitted,

17 Signature: *M. WOLSTENHOLME*
18

19 Marc Wolstenholme
20

21 Plaintiff in Pro Per
22

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